

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE DISTRICT OF DELAWARE**

In re:

FTX TRADING LTD., *et al.*,¹

Debtors.

Chapter 11

Case No. 22-11068 (JTD)

(Jointly Administered)

Ref. Nos. 28102, 28582 & 28642

CERTIFICATION OF COUNSEL

I, Matthew R. Pierce, counsel to the above-captioned debtors and debtors-in-possession (the “Debtors”), hereby certify as follows to the best of my knowledge, information and belief:

1. On November 20, 2024, the Debtors filed, the *Motion of Debtors for Entry of an Order Establishing the Amount of the Disputed Claims Reserve* [D.I. 28102] (the “Motion”).

2. On December 5, 2024, Celsius Litigation Administrator (“Celsius”) filed the *Celsius Litigation Administrator’s Limited Objection to the Motion of Debtors for Entry of an Order Establishing the Amount of the Disputed Claims Reserve* [D.I. 28582] (the “Celsius Limited Objection”).

3. On December 9, 2024, the Debtors filed the *Debtors’ Reply in Support of the Motion of Debtors for Entry of an Order Establishing the Amount of the Disputed Claims Reserve* [D.I. 28642] (the “Debtors’ Reply”).

4. The Celsius Limited Objection has been resolved and, to address informal comments from the Joint Liquidators of Three Arrows Capital, Ltd. (In Liquidation) (the “Joint

¹ The last four digits of FTX Trading Ltd.’s and Alameda Research LLC’s tax identification number are 3288 and 4063 respectively. Due to the large number of debtor entities in these Chapter 11 Cases, a complete list of the Debtors and the last four digits of their federal tax identification numbers is not provided herein. A complete list of such information may be obtained on the website of the Debtors’ claims and noticing agent at <https://cases.ra.kroll.com/FTX>. The principal place of business of Debtor Emergent Fidelity Technologies Ltd is Unit 3B, Bryson’s Commercial Complex, Friars Hill Road, St. John’s, Antigua and Barbuda.

Liquidators”), the Debtors have revised the proposed order (the “Revised Order”), a copy of which is attached hereto as **Exhibit A**. A copy of the Revised Order compared against the proposed form of order attached to the Motion is attached hereto as **Exhibit B**. The Revised Order has been circulated to the Office of the United States Trustee for the District of Delaware (the “U.S. Trustee”), the Official Committee of Unsecured Creditors appointed in these Chapter 11 Cases (the “Committee”), the Joint Liquidators and Celsius (collectively, the “Parties”). The Parties have no objection to the entry of the Revised Order. In accordance with the Court’s electronic order processing procedures, a clean copy of the Revised Order shall be uploaded to CM/ECF.

5. Accordingly, the Debtors respectfully request that the Court enter the Revised Order at its earliest convenience.

Dated: December 10, 2024
Wilmington, Delaware

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/s/ Matthew R. Pierce

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